

## **EGEGAZ ETHICAL GUIDELINES**

Ethical behavior is essential to the success both of EgeGaz as a company and of its employees. Managers are responsible for creating and maintaining an ethical environment across all departments. To this end, all EgeGaz managers:

- Acknowledge the importance both of our ethical guidelines and of the laws and regulations to which our company is subject and they abide by them all and under all circumstances.
- Serve as role models for others through their actions and mindset.
- Champion adherence to these ethical guidelines throughout the company and prioritize ethical behavior above all else.
- Strive to cultivate a corporate culture in which employees understand, embrace and uphold the company's core values and behavioral norms.
- Foster a culture of open communication so that team members feel comfortable raising any concerns, including those related to ethics and thereby ensure that all issues are addressed openly and transparently.
- Are consistent in their actions and decisions at all times.

### **I. USE OF COMPANY RESOURCES**

All the company's resources, including but not limited to its financial assets, must be used efficiently. Company-owned resources are not to be used for personal purposes, whether to pay for personal expenses or as personal gifts, donations, political contributions, or the like.

To maintain information security and ensure the efficient use of company resources, all employees must comply with the company's policies and guidelines regarding the use of the internet and electronic mail through the company's communication networks.

Employees are prohibited from engaging in personal financial relationships with customers, consultants, or suppliers if such relationships might create a conflict of interest or result in personal gain. This includes any actions which prioritize personal interests over the company's interests in agreements or which indirectly utilize the company's financial resources for personal benefit.

The key principles governing the use of company resources are outlined below:

## **1. Representation expenses**

- Representation expenses are to be incurred only as a result of business-related customer interactions or meetings.
- Representation expenses must be used solely for their designated purpose and cannot be reallocated to other spending categories.
- A legally valid expense voucher must be obtained to cover expenditures for which an invoice cannot be issued; such expenditures must not be covered or concealed by invoices obtained from other, unrelated sources.
- Managers may purchase gifts for their subordinates and/or organize events such as dinners, theater outings, or concerts for them in order to foster team spirit, provide rewards, and/or boost morale. Such activities however must be inclusive, with no distinction being made among individual employees or groups of employees.

## **2. Gifts and donations made on the company's behalf**

- Subject to guidelines set by the general manager and within annual budget constraints, gifts may be given to customers on behalf of the company on such occasions as New Year's and other statutorily recognized holidays.
- Gifts must not be used for personal gain or to benefit friends, family members, or other personal acquaintances.
- Subject to budgetary constraints, the general manager has sole authority to make donations or to provide aid to any organization on behalf of the company.

## **3. Time management**

- Time is a critical company asset. All employees are expected to use their time at work effectively and to focus on their job-related responsibilities during working hours. Personal matters should be dealt with outside of working hours. Managers are not permitted to assign to employees any tasks that are of a personal nature. Those who organize meetings are responsible for ensuring that the time allocated for them is used productively. Those who attend meetings are expected to arrive properly prepared for them. Meetings are expected to start and end at the scheduled times.
- To minimize disruptions and maintain productivity, employees should not receive personal visitors during working hours. In rare and exceptional cases, such meetings should be kept brief, not exceeding 10-15 minutes, and should not interfere with the employee's work-related responsibilities.

## **II. RELATIONSHIPS**

### **1. Relations with suppliers**

At EgeGaz, we believe in building strong relationships with our suppliers. This means:

- Always acting ethically and with integrity.
- Supporting and protecting human rights.
- Safeguarding the environment.
- Contributing to the community.

All employees are expected to comply with the EgeGaz Supply Chain Ethics Principles & Rules in their interactions with suppliers.

### **2. Relations with customers**

At EgeGaz, customer satisfaction is paramount. We prioritize customer needs and requests, responding to complaints and inquiries promptly and accurately. We never exploit customer vulnerabilities or provide misleading information for profit, even if it benefits the company.

- Customer complaints are to be logged immediately. Units responsible for handling customer complaints are to report their actions to the general manager diligently and with complete transparency.
- Employees are prohibited from engaging in personal business dealings with company customers. This includes borrowing or lending money.
- Acquiring goods or services from a customer at a significantly reduced price or for free is a serious breach of conduct. This constitutes a conflict of interest and can lead to disciplinary measures, including dismissal.

### **3. Relations with media**

Making statements or giving interviews to media concerns of any kind as well as participating in public speaking events requires the prior approval of the general manager. Employees are prohibited from personally profiting from such activities.

### **4. Relations with public agencies and organizations**

All interactions with public agencies and organizations must adhere to applicable laws and regulations and to comply with company policies. All matters involving requests for information by government officials must be documented in writing. The general manager, legal counsel, and relevant directors must be informed of any such requests in an effective and timely manner.

### **III. RESPONSIBILITIES TOWARDS THE COMPANY**

#### **1. Gifts, invitations, assistance, and donations**

##### **i. Accepting gifts**

Employees are prohibited from:

- Soliciting gifts from customers, suppliers, or consultants.
- Suggesting, even indirectly, that a gift would be appreciated.
- Accepting any items of value such as gifts, money, checks, property, free vacations, or special discounts that might put the company or their receiver under an obligation.

Exceptions:

- Gifts valued under TL 250 (or the equivalent in foreign currency) may be accepted.
- Gifts may be accepted if there is a strong likelihood that refusing them would damage customer relationships.
- Gifts may be accepted if they are unlikely to influence any financial decisions made by the employee receiving them.

However in all these cases, the recipient's immediate supervisor must be informed of the gift. Gifts that do not meet these criteria must be refused in an appropriate manner.

ii. Acceptance of invitations: Invitations to meals, business meetings and social functions which would not influence the decisions of the person invited, which would not conflict with company policies or interests, and which are organized by third parties may be accepted, but only with the approval of the invitee's immediate supervisor.

iii. Acceptance of assistance and donations: No assistance or donations may be accepted from any person or organization that has any form of financial relationship with the company. All proffered assistance and donations must be reported to the intended recipient's immediate supervisor.

#### **2. Avoiding conflicts of interest:**

A conflict of interest arises whenever an employee's personal interests clash with the interests of the company or of its customers. Employees must give precedence to the company's interests over their own and they must never use their position, company assets, or company-confidential information for their personal gain.

Whenever a conflict of interest arises or if an employee is unsure whether a situation constitutes a conflict of interest, the employee must bring the matter to the attention of their immediate supervisor.

Employees must not take advantage of the company's relationships with suppliers to:

- Obtain goods or services for personal use at prices or on terms better than the company receives.
- Purchase goods or services in excessive quantities or for commercial purposes.

When dealing with companies in which former EgeGaz employees have a direct or indirect ownership stake or an employment relationship:

- The connection must be clearly disclosed from the outset
- The dealings must be approved by the EgeGaz Board of Directors.

In situations where EgeGaz employees' family members or close relatives are employed by supplier companies or customers:

- The relationships must not give rise to conflicts of interest
- The approval of the EgeGaz Board of Directors must be obtained before any commercial relationship is entered into.

Employees who are responsible for making purchasing decisions are prohibited from awarding contracts to companies in which family members, close relatives, or friends have a direct or indirect ownership stake. In these cases, a purchasing decision can only be made if all the following conditions are satisfied:

- The employee's relationship with the supplier is fully disclosed during the offer evaluation process.
- The decision is demonstrably in the best interests of the company.
- The EgeGaz Board of Directors is informed of the situation and approves the decision.

EgeGaz employees whose duties do not involve their interacting with customers and suppliers should avoid establishing close personal relationships with the company's customers and suppliers.

EgeGaz employees:

- Are prohibited from seeking or obtaining personal favors or benefits from customers and/or acting as intermediaries between customers for personal gain.
- Must treat all company customers equally and fairly in the event of conflicts of interest among the customers themselves.
- Must make every effort to perform their duties impartially.
- To prevent conflicts of interest, EgeGaz employees must never:
  - Act as guarantors for customers or accept guarantees from customers.
  - Be involved in financial dealings with customers, such as lending or borrowing money, that are inconsistent with professional behavior.
  - Attend events or join domestic or international excursions that are wholly or partially funded by customers without the knowledge and consent of their immediate supervisor.
  - Accept gifts from customers whose nature or value is unusual or which could create a sense of obligation in the recipient.
  - Give extravagant gifts to current or potential customers; use one's position to provide benefits that exceed the intended purpose or deviate from normal practices (such as special shopping discounts) at the customer's places of business.

### **3. Doing business and undertaking duties outside the company**

EgeGaz employees must not:

- Engage in any activity that would qualify them as a merchant, as a tradesperson, or as a self-employed professional for taxation purposes.
- Become a partner in any company (with the exception of passively investing in publicly traded companies through the stock market).
- Undertake paid or unpaid positions in any kind of company or commercial enterprise, or with a merchant or tradesperson.
- Serve on the board of directors of any company that is not an EgeGaz subsidiary or affiliate.

With the approval of the EgeGaz general manager, EgeGaz employees may assume positions in cooperatives, professional chambers, associations, professional or social societies, foundations, and confederations etc provided that they are related to the company's principal business activities; they may also undertake duties in other socially-beneficial entities and organizations.

Employees with specialized expertise may lecture at professional conferences or teach at universities and vocational schools, but only if the following conditions are met:

- Their primary work responsibilities are not adversely affected.
- They have obtained the permission of the EgeGaz general manager.

#### **4. Political activities**

Whether on the company's or their own behalf, EgeGaz personnel may not provide financial or moral support to political activities, even if they are personally able to afford it. They may not be active members of any political party while they are in EgeGaz's employ. Managers may not ask their employees to engage in political activities or to become a member of a political party.

#### **5. Discrimination**

All discrimination based on age, language, race, health status, gender, or marital status is a violation of company policy and will result in disciplinary action, up to and including termination of employment. Employees may report any concerns about discrimination directly to Human Resources, even if that means bypassing all their superiors. No one may interfere with an employee's right to report such complaints to Human Resources.

#### **6. Personal assistance and donations**

On condition they notify Human Resources, EgeGaz employees may freely engage in the following activities outside of work hours and off company property:

- Provide financial or other support to individuals or causes.
- Make charitable donations.
- Undertake duties for charitable organizations.

### **IV. GENERAL RULES**

All EgeGaz employees have an obligation to:

- Protect the brand.
- Abide by the principle of professional confidentiality.
- Protect the personal data of employees, customers, suppliers and other business partners which their job gives them access to.
- Perform their duties honestly.

- Diligently protect the company's assets.
- Comply with all applicable laws and regulations and with company-issued policies and directives.

Employees are expected to obey instructions given to them by their supervisors. However if an employee believes that an instruction violates the law and/or is contrary to company-specified policies, or regulations, or ethical guidelines (including the spirit of such guidelines), they must report the situation to the immediate supervisor of the person who gave the instruction and/or to the email address reserved for reporting unethical behavior. Employees who report concerns about unethical or illegal instructions will be protected from any form of retaliation.

### **Protecting the brand**

The EgeGaz brand is our most important asset, one from which we derive strength in all our activities. Our primary goal is to consistently protect and enhance the strong reputation of our brand in line with our marketing and communication principles. EgeGaz employees are expected to perform their duties in accordance with the principles of protecting and enhancing the EgeGaz brand.

We respect the privacy of our employees' personal social media accounts and their right to choose what they share. However we also expect employees to:

- Use personal email addresses (not company email addresses) to create these accounts.
- Refrain from posting content that could lead to disputes, uncertainties, or misrepresent the company.
- Refrain from sharing any information or visuals that would violate data-confidentiality agreements..

### **Confidential information**

EgeGaz employees have a duty to protect confidential company information. Such information must not be disclosed to anyone in the company who is not authorized to know it or to anyone outside the company unless explicitly required by law.

Employees who have access to confidential or non-public company information or who gain first-hand knowledge of it in the conduct of their duties may not disclose that information to anyone who is not authorized to have it.

“Confidential information” is any and all manner of written, verbal, or electronic-format information about the company that employees learn through their work, whether in the past, in the present, or in the future.

Employees may only share confidential information with other EgeGaz employees who have a legitimate need to know, and only within the bounds of company policies and regulations. Disclosure of confidential information to any third party outside the company is strictly prohibited. Disclosing company secrets to any party other than legally mandated authorities will be treated as a breach of EgeGaz’s ethical guidelines.

All information and content created for or by EgeGaz are the exclusive property of EgeGaz. This includes but is not limited to:

- Analyses and plans
- Publicly disclosed or undisclosed Information
- Financial data
- Service details
- Capacity reports
- Software
- Expenditures
- Business plans
- Customer and supplier lists
- Work methods and marketing strategies
- Internal regulations, announcements, and instructions.

### **Protecting confidential information**

All necessary precautions are to be taken to ensure the confidentiality, safe storage, and non-disclosure of company-related information. Specifically:

- At the end of working hours, desktops are to be cleared and confidential documents, if any, are to be locked away with the keys being kept in a secure place.
- Passwords and access codes must be kept secret and not shared with anyone.
- Company information must not be copied to removable storage devices or uploaded to external services, except when required for business purposes or to comply with legal obligations.

- Individuals who are not employees of EgeGaz are strictly prohibited from accessing the company's information network or using the company's computers.

### **Compliance with laws and regulations and with company policies and directives**

The first priority of EgeGaz employees is to comply with the requirements of laws and regulations and with company policies and directives and to refrain from any act that might pose risks. EgeGaz employees must never abuse their position or allow others to do so. Abuse of duty occurs when an employee uses their authority or responsibilities for personal gain, potentially harming the company or its business partners.

EgeGaz employees must not engage in or condone any illegal behavior, including theft, fraud, or other dishonest acts.

All EgeGaz employees have a responsibility to report any violations of the company's ethical guidelines which they may witness. Such concerns should be reported to a senior manager and/or to the email address reserved for reporting unethical behavior.

### **V. ENFORCEMENT OF ETHICAL GUIDELINES**

Violations of EgeGaz's Code of Ethics and its principles will result in disciplinary action. Such action may include, but is not limited to, termination of employment.

All EgeGaz employees are responsible for understanding and adhering to the company's Code of Ethics. Any action that violates these rules is unacceptable. Ethical considerations must be at the forefront of all EgeGaz activities and decisions. Employees should always consider whether their actions and decisions align with the company's Code of Ethics. If there is any uncertainty about whether an action or situation complies with the Code of Ethics, employees are encouraged to seek guidance through the email address designated below. All communications will be treated in confidence.

Email: etik@egegaz.com.tr